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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-cv-05944 (JST)

MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
Case No. 3:13-cv-01173-JST*

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF SHARP
ELECTRONICS CORPORATION
AND SHARP ELECTRONICS
MANUFACTURING COMPANY OF
AMERICA, INC.'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL**

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP,
3 counsel for Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp Electronics Manufacturing
4 Company of America, Inc. (“SEMA”). I am a member of the bars of the State of Maryland, the State of
5 New York, and the District of Columbia, and I am admitted to practice before this Court *pro hac vice*.

6 2. I submit this Declaration in support of SEC and SEMA’s Administrative Motion to
7 File Under Seal Pursuant to Civil Local Rules 7-11 and 79-5. I have personal knowledge of the matters
8 set forth herein and, if called as a witness, I could and would testify competently to them.

9 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter
10 (Dkt. No. 306) (the “Stipulated Protective Order”).

11 4. Pursuant to Civil Local Rules 7-11 and 79-5, SEC and SEMA, by and through
12 counsel, respectfully request an Order permitting them to file under seal the highlighted portions of SEC
13 and SEMA’s Motion for Leave to File Motion for Reconsideration, and the proposed Motion for
14 Reconsideration attached thereto as Exhibit A (together, “the Motions”), filed contemporaneously
15 herewith, which refer to and contain excerpts of and/or statements derived from the following expert
16 reports: (a) the Expert Report of Jerry A. Hausman, dated April 15, 2014, which has been designated as
17 “Highly Confidential” pursuant to the Protective Order, and previously been filed under seal (ECF No.
18 3590-6, Ex. A); and (b) the Supplemental Expert Report of Jerry A. Hausman, dated July 3, 2014, which
19 has been designated as “Highly Confidential” pursuant to the Protective Order, and previously been filed
20 under seal (ECF. No. 3590-6, Ex. B).

21 5. The expert reports identified in Paragraph 4 have been designated as “Highly
22 Confidential” pursuant to the Stipulated Protective Order. The highlighted portions of the motions
23 contain excerpts of and/or statements derived from those expert reports which reflect confidential,
24 nonpublic, proprietary and highly sensitive business information, and thus “compelling reasons” exist
25 for filing the highlighted portions under seal. *See, e.g., Kamakana v. City & Cnty. of Honolulu*, 447
26 F.3d 1172, 1179 (9th Cir. 2006).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Craig A. Benson
Craig A. Benson